



Environmental Utilities
Administration
2005 Hilltop Circle
Roseville, California 95747

January 5, 2016

Ms. Kathy Frevert
State Water Resources Control Board
Via email: Kathy.Frevert@waterboards.ca.gov

Re: Comments on Proposed Regulatory Framework

Below are the City of Roseville's comments on the State Water Resources Control Board (State Water Board) staff's *Proposed Regulatory Framework for Extended Emergency Regulation for Urban Water Conservation*. We appreciate the efforts of staff and the State Water Board to consider changes to the emergency regulation, based on lessons learned this past year.

Fortunately, due to years of proactive drought planning and a community willing to take the call to conserve seriously, the City of Roseville's water conservation efforts have consistently exceeded our 28 percent state conservation target. From January 2015 to December 2015, the City of Roseville has conserved 33 percent, compared to the same period in 2013.

These results, which our community takes great pride in; however, have not come without the significant financial and aesthetic burden of lost landscapes, including damage to our urban forests. As such, we strongly support the State Water Board staff proposal to add a climate adjustment into extended emergency regulations. This modification recognizes the greater burden that was placed on residents of California's inland areas, and provides a modest level of relief.

In addition, we encourage staff and the Board to explicitly address the need to reconsider the extended emergency regulations in April 2016 based on hydrologic conditions. Sierra snowpack, storage in the State's major reservoirs, projected runoff, cumulative precipitation, available local water supplies, and other factors can be used to assess the extent to which ongoing drought represents an "emergency" statewide and in each region.

Continuing to expect these sacrifices without clear and convincing evidence of an ongoing drought emergency will reduce the public's trust in state and local agencies and hinder both short and long term achievement of water conservation and efficiency goals.

Finally, while we understand that State Water Board staff are focused on maintaining statewide performance to the Governor's mandated 25 statewide conservation target, we implore the State Water Board to ensure that staff are not losing sight of the importance of encouraging and incentivizing local investments to become drought resilient, such as development of recycled water infrastructure and capacity for conjunctive use of groundwater.

The proposed regulatory framework has a significant disconnect with existing state policy, such as the California Water Action Plan, and policies adopted into state statute, over many years, that encourage and incentivize these local investments in recycled water and conjunctive use of groundwater.

We encourage the Board to reconsider ways to appropriately credit previous local investments in recycled water and conjunctive use of groundwater. Ignoring this notion would send a negative signal to local water agencies and their ratepayers that these local drought resilient investments are for naught.

In summary, we commend the State Water Board for its leadership and staff for their efforts. We urge the State Water Board to adopt staff's climate adjustment proposal, commit to a robust evaluation of the ongoing need for emergency measures in April 2016, based on an assessment of water supplies, and reconsider appropriate credits related to local investments in recycled water and conjunctive use of groundwater to become more drought resilient.

Sincerely,



Richard D. Plecker, P.E.
Environmental Utilities Director

cc: Assemblywoman Beth Gaines
Senator Jim Nielsen
John Woodling, Executive Director, Regional Water Authority